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Functional Chemicals

May 15, 2002

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: Chemical Right-To-Know

Re: Additional Information on Phosphoryl Chloride Polymer with Resorcinol Phenyl Ether  
CAS No. 125997-21-9

Akzo Nobel Functional Chemicals LLC is pleased to provide you with the following additional information regarding the substantial effort undertaken to identify all available health and environmental tests conducted with Phosphoryl Chloride, Polymer with Resorcinol Phenyl Ether. Every effort was made to be as inclusive as possible during our data search, so as to minimize the need for further testing.

Akzo Nobel Functional Chemicals reviewed product files for any final reports, raw data, or other technical information pertaining to Phosphoryl Chloride, Polymer with Resorcinol Phenyl Ether. Several electronic databases were thoroughly searched by chemical name, synonyms, and by CAS number, to identify reports, technical articles, books, or other publications that discuss this chemical substance. The Toxicology Data Network (TOXNET) databases investigated include the Hazardous Substances Data Bank, Toxline, and the Developmental and Reproductive Toxicity Data Base. In addition, the Safety Information Resources Inc. database was searched. PubMed, an electronic database of the National Library of Medicine, was also searched for publications in which Phosphoryl Chloride, Polymer with Resorcinol Phenyl Ether is discussed. Information obtained from these electronic resources was included in the Robust Summaries submitted to the Agency.

A substantial number of aromatic phosphate esters exist and they are associated with very different toxicologic properties. For this reason, Akzo Nobel Functional Chemicals evaluated the toxicity of Phosphoryl Chloride, Polymer with Resorcinol Phenyl Ether in GLP-complaint tests following both EPA and OECD guidelines. The results of these evaluations have been published as peer-reviewed articles. We believe the completed tests fully meet and fulfill the SIDS endpoints.

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Akzo Nobel Functional Chemicals is committed to the guidelines defined in the October 14, 1999 letter, which have been carefully considered in the development of the Test Plan.

We trust this information is of help to the Agency regarding Phosphoryl Chloride, Polymer with Resorcinol Phenyl Ether. We ask that this supplemental information be posted on the Environmental Protection Agency HPV Challenge web site.

Very truly yours,

William F. Gentit  
Manager, Regulatory Affairs

cc: Jim Keith – American Chemistry Council  
Kelly Triplett – Akzo Nobel Chemicals Inc.